

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

JESSE CARMON, :
Plaintiff, :
v. : Civil Action No. 1:14-cv-00428-GBL-TRJ
MARK SITES, *et al.*, :
Defendants. :

DEFENDANTS' PRETRIAL DISCLOSURES

COME NOW the Defendants, Mark Sites and Georgi Hovhannisyan, by and through undersigned counsel, Alexander Francuzenko, Lee B. Warren, and the law firm of Cook Craig & Francuzenko, PLLC, and hereby submit the following exhibit and witness lists.

DEFENDANTS' TRIAL WITNESSES

Will Call

1. Georgi Hovhannisyan
2. PFC Eric Halusa

May Call

1. Jessie Carmon
2. Pedro Santiago
3. Robert Rainey
4. Michael Tang
5. Mark Sites
6. Nurse Harding
7. Sergeant Scott Owens

8. Inmates who witnessed the incident.
9. Defendants reserve the right to call any witnesses the Plaintiff names.
10. Defendants reserve the right to call any witnesses identified in discovery.

DEFENDANTS' TRIAL EXHIBITS

Will Use

1. Hovhannisyan Incident Report
2. Halusa Incident Report
3. G. Shammass Incident Report
4. Carmon's medical records from INOVA Fair Oaks Hospital

May Use

5. Inmate records
6. Fairfax ADC Chronological Record of Medical Care
7. Photographs of Carmon
8. Defendants reserve the right to use any exhibits identified by Plaintiff.
9. Defendants reserve the right to use any exhibits identified in discovery.

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October, 2014, I served a copy of the foregoing Defendants' Pretrial Disclosures upon the following via ECF:

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